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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

BCB CHEYENNE LLC d/b/a BISON
BLOCKCHAIN, a Wyoming limited
liability company,

Plaintiff,

vs.

Civil No. 23-CV-79J

MINEONE WYOMING DATA CENTER
LLC, a Delaware limited liability company;
MINEONE PARTNERS LLC, a Delaware
limited liability company; TERRA
CRYPTO INC., a Delaware corporation;
BIT ORIGIN, LTD., a Cayman Island
Company; SONICHASH LLC, a Delaware
limited liability company; BITMAIN
TECHNOLOGIES HOLDING COMPANY,
a Cayman Island Company; BITMAIN
TECHNOLOGIES GEORGIA LIMITED, a
Georgia corporation; and JOHN DOES
1-18, related persons and companies who
control or direct some or all of the named
Defendants,

Defendants.

***BITMAIN TECHNOLOGIES GEORGIA LIMITED'S NOTICE OF
WITHDRAWAL OF DESIGNATION OF JOHN KENYON
HAYWARD AS EXPERT WITNESS***

Defendant Bitmain Technologies Georgia Limited ("Bitmain Georgia") hereby
withdraws John Kenyon Hayward as an expert witness in this action.

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Mr. Hayward was engaged by Bitmain Georgia and its counsel O'Melveny & Myers LLP ("O'Melveny") to serve as an expert witness exclusively on Bitmain Georgia's behalf. No other Defendant has ever paid or retained Mr. Hayward for his professional time and services in connection with Mr. Hayward's Expert Report [ECF 283 and 284] or expert testimony. Although Defendants MineOne Wyoming Data Center, LLC, MineOne Partners LLC, and Terra Crypto, Inc. filed a document [ECF 285] in which they purport to have cross-designated Mr. Hayward as their Expert Witness, Bitmain Georgia and O'Melveny have never given their consent to those defendants to designate Mr. Hayward jointly as their expert and specifically told them prior to their filing that document that Bitmain Georgia and O'Melveny did not consent to their filing a joint designation.

Bitmain Georgia objects to the extent any other defendant seeks to cause Mr. Hayward to provide expert or other testimony in this action, including to subpoena him, depose him, or call him to appear at trial, for any purpose.

Dated: September 10, 2024.

BITMAIN TECHNOLOGIES GEORGIA
LIMITED, Defendant

BY: s/Khale J. Lenhart

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CERTIFICATE OF SERVICE

I certify the foregoing ***Bitmain Technologies Georgia Limited's Notice of Withdrawal of Designation of John Kenyon Hayward as Expert Witness*** was served upon all parties to this action pursuant to the Federal Rules of Civil Procedure on 10 September 2024, and that copies were served as follows:

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s/Norma J. Hubka
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